

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -NSPS SOURCE
RENEWAL

PERMITTEE

International Paper Company
Attn: Mr. Roger Knapp
100 East Oakton Street
Des Plaines, Illinois 60018

<u>Application No.:</u> 73050433	<u>I.D. No.:</u> 031063ADM
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 2, 2006
<u>Subject:</u> Corrugate Boxes Manufacturing Plant	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 100 East Oakton Street, Des Plaines	

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five flexographic printing/slotting/folding/gluing machines controlled by cyclones and baghouses, a folder/gluer, five laminators, one starch storage silo controlled by a filter and one boiler pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. The boiler is subject to New Source Performance Standards (NSPS) for Small Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subpart A and Dc. The Illinois EPA is administering these

standards in Illinois on behalf of the United States EPA under a delegation agreement.

- b. At all times the Permittee shall, to the extent practicable, maintain and operate the boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
- 3a. This permit is issued based upon the flexographic printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart H: Printing and Publishing, Section 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 25 tons per year from the subject sources.
- b. This permit is issued based upon the laminating and gluing operations not being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart PP: Miscellaneous Fabricated Product Manufacturing Process. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year from the subject sources.
4. Plant-wide usage of raw materials and VOM emissions, including all clean-up operations, shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> <u>(wt. %)</u>	<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Inks	25	220	5.0	1.3	11.0
High-VOM Glue	2	25	4.0	0.1	1.0
Low-VOM Glue	250	2,000	0.5	1.3	10.0

These limits define the potential emissions of VOM and are based on the maximum actual emissions determined from the maximum production capacity and VOM content of raw materials. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

5. Operation and emissions of the boiler shall not exceed the following limits:

Maximum Firing Rate: 28.6 mmBtu/hour

<u>Pollutant</u>	<u>Emission Factor</u> <u>(Lb/mmBtu)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO _x)	0.098	1.0	12.3
Carbon Monoxide (CO)	0.083	0.84	10.4
Volatile Organic Material (VOM)	0.0054	0.06	0.7

These limits are based on standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

6. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons

per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

7. This permit is issued based on negligible emissions of particulate matter from the starch storage silo. For this purpose emission shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 tons/year.
- 8a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. The Permittee shall maintain monthly records of the following items:
 - i. Names and amounts of inks, glues and other VOM containing materials used (tons/month);
 - ii. VOM and HAP content of materials in item (a) (weight %);
 - iii. Natural gas usage (mmscf/month); and
 - iv. Monthly and annual emissions of CO, NO_x, VOM and HAP with supporting calculations (tons/month and tons/year).
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from

the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.

10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to incorporate the installation of the Crittenden Long Way Laminator 352 and Staley 86" Press 141 to replace the Long way laminator and the F & E 66" Press, respectively, from Construction Permit 06020042.

If you have any questions on this, please call Jocelyn Stakely at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JRS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Corrugated Boxes Manufacturing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is use of 220 tons of inks and 2,025 tons of glues and adhesives per year. The resulting maximum emissions are well below the levels (e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Equipment</u>	<u>VOM</u> <u>(T/Yr)</u>	<u>HAPs</u>		<u>NO_x</u> <u>(T/Yr)</u>	<u>CO</u> <u>(T/Yr)</u>	<u>PM</u> <u>(T/Yr)</u>
		<u>Combined</u> <u>(T/Yr)</u>	<u>Single</u> <u>(T/Yr)</u>			
Starch Silo with Baghouses						0.44
Boiler	0.7			12.3	10.4	
All Other Equipment	<u>22.0</u>					
Totals:	22.7	< 25	< 10	12.3	10.4	0.44

JRS:psj